

In the County of Yarmouth, Nova Scotia, Canada

**Affidavit of Charles L. Leary**

BEFORE ME, personally came and appeared Charles L. Leary, a person of the full age of majority and domiciled in Kemptville, Yarmouth County, Nova Scotia, who, after being duly sworn, did depose and say:

1. I am a Managing Director, chef, and proprietor of Trout Point Lodge, Limited. I have personal knowledge of the Lodge's business.
2. Trout Point Lodge conducts business in Nova Scotia as a fixed roof accommodation and restaurant. It has one single location. It is a Nova Scotia corporation.
3. I have not resided in Louisiana since 1998 or the United States since 2004. I have resided in Canada to build and run Trout Point Lodge at least seasonally since 1998.
4. I have monitored the Slabbed blog since January, 2010, when on January 6, 2010, news media such as the New Orleans *Times-Picayune* and WVUE Fox Television associated and misidentified Trout Point Lodge as belonging to or being controlled by Aaron Broussard, whose administration was at that time under federal criminal and state ethics board investigation. The *Times-Picayune* articles were written or co-written by reporter Richard Rainey.
5. I have downloaded and read a post on the Yahoo! Finance forum by Sop81\_1, who I know to be Douglas Handshoe, published on the morning of January 7, 2010 where Handshoe writes:  
"Broussard has some nice digs in Nova Scotia eh? Bad form not memorializing the ownership transactions with actual monetary transactions. You know the old saying, "Money talks and Bullsh\*t walks." Perp walk that is. . . . My sources are telling me Broussard is going down with Chocolate guy. . . . sop."
6. From that point on, Handshoe published on the topic of Trout Point Lodge and Nova Scotia, most often on the Slabbed blog, but also on other web sites, including Twitter.com and Redditt.com.
7. On January 20, 2010 and again on April 7, 2011, the *Times-Picayune* published retractions regarding reporting on Trout Point Lodge.
8. The January 20, 2010 retraction was published above the fold as the top right-hand headline in the print editions of the newspaper. It was also published at nola.com where it remains today.

The headline was in bold font. It read: "**Newspaper retracts assertion about lodge.**" An actual size photocopy I made of that front page is attached hereto as Exhibit "A".

9. The body of the article said:

The Times-Picayune has referenced Trout Point Lodge in some of the stories published in print and online since Jan. 6 regarding an ethics complaint against former Jefferson Parish President Aaron Broussard claiming that he owns a Nova Scotia vacation lodge that he rented to parish contractors.

The newspaper retracts publication identifying Aaron Broussard as having an ownership interest in Trout Point Lodge; asserting Trout Point Lodge was rented to Jefferson Parish contractors; indicating that Roy D'Aquila has any part in Trout Point Lodge ownership or management; indicating that Kempt Wilderness Lodge Services has any ownership or management relationship with Trout Point Lodge; and identifying a photo of the lodge online as "Broussard-lodge.jpg." The Times-Picayune apologizes for publishing this material.

10. This retraction and an earlier correction were published after Vaughn Perret and I contacted the Managing Editor, Mr. Peter Kovacs, of the Times-Picayune to point out factual errors in their reporting. This retraction was printed before any law suit was filed against the Times-Picayune and others.

11. The April, 2011 retraction appeared online only. It stated:

**Retraction - Trout Point Lodge**

In January 2010, The Times-Picayune published several articles that mentioned Trout Point Lodge and its business dealings while discussing Jefferson Parish politics and the scandal in the administration of former Parish President Aaron Broussard. The newspaper retracts publication implying that Trout Point Lodge was involved in the scandal.

The newspaper believes there is no basis for making any implication that Trout Point Lodge, Limited or its owners, Daniel Abel, Vaughn Perret, or Charles Leary, were involved in any wrongdoing and, indeed, never intended to make any such implication. The Metropolitan Crime Commission complaint to the Louisiana Ethics Board about Broussard's vacation property in Nova Scotia in fact did not name or implicate any of

them. The Times-Picayune apologizes for errors in its reporting regarding Trout Point Lodge and its owners.

12. Mr. Handshoe is still publishing on me, Vaughn Perret, and our business Trout Point Lodge in July, 2012. He has not ceased publishing on us since January, 2010.
13. His publishing on Vaughn Perret, Trout Point Lodge, and I intensified in quantity in April, 2011.
14. In a post referred to at Row 8 of the Table presented in evidence in the briefing book on January 30, 2012. It was entitled "Slabbed takes a look at the Trout Point business venture: Let's start at the end and work back" published April 26, 2011. He stated:

I think by now even our most casual readers know our successor website, slabbed.org was knocked offline courtesy of the Times Picayune's corporate parent Advance Publications and this started a chain of events that resulted in Slabbed temporarily being moved back to WordPress. I'd submit this was a miscalculation of gargantuan proportions for several reasons, which will become clear as I roll out this series of posts on Aaron Broussard's connections to Trout Point Lodge and its purported owners, Charles Leary, Danny Abel and Vaughn Perret. I say purported because others were sold 2% ownership interests in the Trout Point development as touted by Broussard and those folks are the bagholders in this deal.

15. I read on this and other posts that Advanced Publications had served a Digital Millennium Copyright Act (DMCA) take-down notice on Slabbed's new web host. According to posts on Slabbed, the host—Go Daddy—decided to refuse service to Handshoe altogether. The publications in question in the DMCA notices were Handshoe's republication on Slabbed of the entirety of retracted articles about Trout Point Lodge and Aaron Broussard. Handshoe lost his web host.
16. He has referenced and written about both Times-Picayune retractions on Slabbed. I have read such posts.
17. His publishing activities have included publishing a photograph of me as well as photographs of Vaughn Perret and I, and a photograph of Trout Point Lodge on Slabbed. These photographs were taken from copyrighted web sites, including material that is the intellectual property of the National Geographic Society and the Ashoka Foundation.
18. I have personal knowledge that in the Fall of 2011, the National Geographic Society and the Ashoka Foundation served DMCA take-down notices on Slabbed's web host regarding

publishing the copyrighted photographs of me and Mr. Perret. Both organizations sent me emails to me confirming that such notices had been served. Such email correspondence is in the book presented in evidence on January 30, 2012.

19. The photographs disappeared for a period of time. These photographs are now once again published on Slabbed.
20. The photographic portrait of me taken by the National Geographic Society during the 2010 Geotourism Summit at Society headquarters in Washington, D.C., was published by Handshoe on a Slabbed post entitled "We have a winner and he is still a loser after all these years,...." on September 6, 2011.
21. In that post, Handshoe published: "he was a grifter in the exotic cheese biz down here and evidently remains the same in Nova Scotia as Slabbed literally trips on all the skeletons in the pasts of the girls at Trout Point Lodge. He remains a loser because he still doesn't know how to properly serve his frivolous lawsuits."
22. In that same post he wrote: "Stay tuned as disgruntled former employees of Trout Point Lodge are contacting Slabbed with info as Slabbed systematically solves the Mystery in Nova Scotia and its connections to the disgraced Aaron Broussard."
23. In that post, he associates me with a Louisiana law suit involving dairy goats in which I was never a party. My name was mentioned in the suit as part of the fact pattern because I put one person who wanted to buy dairy goats in touch with another person who was selling dairy goats. Mr. Handshoe published that it way my lawsuit, which was not true.
24. There are at least 2 Slabbed posts where Handshoe has published the photograph of Vaughn Perret and I, taken by the Ashoka Foundation at the Geotourism Summit.
25. In one, entitled "Slabbed solves the mystery on the shores of the Tusket River in Nova Scotia as we reveal the Trout Point connection to the Jefferson Parish political Corruption Scandal" and dated September 6, 2011 (Row 31 of the table in the briefing book), Handshoe states: "I've done more than a few posts on the topic of Trout Point Lodge since it first appeared on the pages of the Times Picayune back in January 2010." Handshoe hyperlinks the text "Trout Point Lodge" to a page of posts tagged "Trout Point Lodge."
26. In that post, he also hyperlinked to a January 12, 2010, Slabbed post and republished a "correction" published earlier by the Times-Picayune:

Evidently Rich Rainey began researching this matter and he found that the Nova Scotia

property known as Trout Point had several local, politically connected owners but that didn't stop Perret from sending his bottom bitch Charles Leary out to mislead and threaten. For that we circle back to my post on the topic from January, 2010 which excerpted one of Rainey's reports:

A photo caption in some Thursday editions of The Times-Picayune said that former Jefferson Parish President Aaron Broussard owns a stake in a luxury development centered around Trout Point Lodge in Nova Scotia. An accompanying story quoted Bennett Powell, owner of a Metairic insurance claims adjusting firm that does business with Jefferson Parish, as saying that Broussard's property was Trout Point Lodge. Charles Leary, managing director of Trout Point, said Broussard has no "ownership or management involvement with Trout Point Lodge, Limited." Corporate records in Canada do not list Broussard as an officer of Trout Point Lodge Limited.

Broussard, "does not and has never had any ownership or management involvement with Trout Point Lodge, Limited." The message went on to say Broussard owns a "vacation home on the same road."

Those assertions are bald face lies. I frankly never understood how a news organization with the cojones take on Garlandfill would run like scared children from grifting gay men in Nova Scotia but it is what it is folks. And the reason I say that Leary lied? Mainly because I have been talking to former employees whom I've granted anonymity so as to spare them the hassle of defending a frivolous SLAPP suit in Canada:

In answer to the question as to who handled the money for Aaron's property? Definitely Trout Point.

This makes sense and confirms a long-held suspicion that the girls were the fiscal agents for all the cabins owned by Louisianans close to the Lodge including Aaron Broussard. That said the Lodge's financial records would certainly contain evidence to either support the pay-to-Trout Point to play in Jefferson Parish allegations that are at the heart of this story. My chatty new friend didn't stop there though. You see the girls have left a trail of financial wreckage in Canada reportedly screwing over trade venders and

others building the Lodge and that harebrained exotic cheese farm La Ferme D'Acadie where they shafted the Atlantic Canada Opportunities Agency.

27. In that post, Handshoe publishes information obtained from the Nova Scotia Property Records Database, including addresses and tax assessment values for properties on the Trout Point Road in Kemptville, Nova Scotia. I am familiar with this site. This is a Nova Scotia government web site hosted from Nova Scotia that requires registration and agreement to a contract with the Province of Nova Scotia to use the site.
28. After publishing the property information, Handshoe concluded the post with this statement:  
"The next question we must ask ourselves is do these activities constitute money laundering because if an illegal act occurred Leary and his blowbuddy Perret along with Danny Abel have lots of explaining to do. Stay tuned as we have more on the mystery on the shores of the Tusket River."
29. In a post entitled "BREAKING: Aaron Broussard Laundered his money through Nova Scotia!!!! A Trout Point Update." This was published on or around the day that the U. S. Attorney's Office filed a Factual Basis with the federal court in New Orleans, January 17, 2012. It was in the table in the briefing book, Row 70.
30. In the spiral bound book submitted in evidence on January 30, 2012, there is a table of publications by Handshoe that also indicates the url and has our comments on the publications. At Row 15, there is a publication entitled "Laissez les bons temps rouler! Slabbed travels back in time with the girls and ties a few things together. A Trout Point Lodge / Jefferson Parish Political Corruption Scandal Update Part 2" from August 17, 2011.
31. In it Handshoe states "I continue to meticulously lay down the trail of scams and political corruption that leads to Nova Scotia and Trout Point Lodge."
32. I have never participated in any pay-to-play scheme involving Aaron Broussard and government contractors. I have no knowledge whatsoever of such a scheme. To my personal knowledge as an officer and hands-on proprietor, Trout Point Lodge has never participated in such a scheme, or been used in such a scheme.
33. I have never co-owned or managed any property used to funnel kickbacks from contractors doing business with Jefferson Parish.
34. I have never participated in money laundering, whether involving Aaron Broussard or in any other way.

35. I looked at The Merriam-Webster Online Dictionary. It defines "to grift" as transitive verb "to obtain (money) illicitly (as in a confidence game); intransitive verb : to acquire money or property illicitly.
36. I was never involved with schemes to illicitly obtain money. Trout Point Lodge was never involved in such schemes either.
37. I have closely followed press reports about the investigation and indictment of Aaron Broussard. To my knowledge, Mr. Broussard has not been indicted for money laundering or kickback schemes. Rumor and speculation in online forums and blogs I have seen, including but not limited to Slabbed, have said Broussard was involved in kickback schemes and money laundering.
38. Trout Point Lodge's financial records since its inception show or contain nothing about a criminal or unethical scheme.
39. The lawsuit with the Atlantic Canada Opportunities Agency (ACOA) in which I was a defendant and a plaintiff by counterclaim was discontinued by both sides on May 4, 2010 as evidenced by a stamped Notice of Discontinuance filed with the Nova Scotia Supreme Court that I have in my possession. <sup>To the best of my recollection</sup> Handshoe first published on the lawsuit and ACOA after the Discontinuance. That dispute involved facts and a contract entirely based in Nova Scotia. That dispute was settled amicably out of court earlier in 2010. c.c.c
40. Based on personal experience as a self-represented party in Nova Scotia, I know that one can simply telephone the Supreme Court of Nova Scotia to find out if a lawsuit is still active or has been discontinued.
41. I performed a Google Site Search of Slabbed on July 8, 2012. According to that search, searching for "ACOA" on Slabbed yields "about 210 results."
42. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for "Atlantic Canada Opportunities Agency" yields "about 339 results."
43. In a post entitled "The problem with lying is keeping all of them straight. A Jefferson Parish Political Corruption / Trout Point Lodge Scandal Update Part 3" published on August 24, 2011, Handshoe writes about ACOA and the Nova Scotia lawsuit settled in May, 2010.
44. He stated in that post: "At this point Leary has lost at every point of the proceedings in Nova Scotia. He was compelled to disclose the names of the owners in La Ferme d'Acadie and produce records in the Canadian equivalent of discovery."



45. It is untrue that I had lost at every step in that lawsuit. It is untrue that I was compelled to disclose the names of the owners in La Ferme d'Acadie, and it is untrue that I was compelled to produce records. It is untrue that the lawsuit was ongoing in August, 2011.
46. In fact, by Order of Justice LeBlanc of the Nova Scotia Supreme Court, on my motion ACOA was ordered to produce as yet un-produced documents to me, not the other way around. This fact was published in an opinion of the Nova Scotia Court of Appeal. I have seen Handshoe refer to this decision on Slabbed so I believe he was aware of it. The Court of Appeal wrote:
- “[5] On April 17, 2009 Justice LeBlanc granted the second order under appeal, the Production Order. He ordered ACOA to produce all documents “relating to any matter in question in the proceeding not already produced in [ACOA’s] List of Documents dated May 9, 2008, in [ACOA’s] possession, custody or control”, including “all further documents...relating to any applications made for funding, to [ACOA], by any of the Defendants from 1997 to the date of this order.”
47. In fact, by Order of the Nova Scotia Court of Appeal in their decision known as “La Ferme d’Acadie v. Atlantic Canada Opportunities Agency, 2009 NSCA 104,” the province’s highest court said at paragraph 21: “In these particular circumstances and, in the interests of judicial efficiency, I am satisfied that it is in the interests of justice that the Disclosure Order be set aside in total to the effect that ACOA cannot rely on it to obtain any information from the appellants and the appellants may proceed to prosecute their crossclaim.”
48. In that same August, 2011, post, Handshoe published:

I have this bit of research courtesy of several readers but one of our new friends in Nova Scotia sums it up for us:

I went back to Registry of Joint Stocks Nova Scotia.....I found this:

La Ferme D’Acadie (a limited company), was registered two days later, June 25, 1998, again showing all 3 (Abel, Leary and Perret) as partners, but this time Abel’s address is Mt Hermon Lousiana. This fits in with the piece written on the Lodge in 2001....

Five months later they come back to register Trout Point Lodge, again all 3, same address given, 107 Chebogue Point Rd, Yarmouth. Registered Dec 14,1998.



Then they realize they made a mistake, they failed to register as the all important "limited" corporation that protects their assets, so they fixed that right away, dissolving this and registered Trout Point Lodge Ltd Dec 14, 1998, and this time they took off Abel's name, and just have Leary and Perret as partners, their address being 189 Trout Point Rd, East Kemptville. Now note that their address likely changed to Trout Point Road after 1998, likely in 2000 when the Lodge was built.

49. In a post entitled "Slabbed takes a look at the Trout Point business venture: Let's start at the end and work back" published on April 26, 2011, Handshoe published on the ACOA lawsuit.
50. In this post, Handshoe published from a Nova Scotia court decision. He republished a portion where the judge summarized my sworn testimony. Handshoe stated: "Obviously there is a huge problem here – that of a liar or in this case a perjurer keeping his lies straight."
51. In another post entitled "Slabbed explores former Jefferson Parish President Aaron Broussard's business activities in Nova Scotia Part 2: You own 100% of 2% of nothing" published on January 24, 2012, Handshoe published a photograph from the Nova Scotia government publication *Nova Scotia Open to the World* picturing Vaughn Perret, Daniel Abel, and I at Trout Point, Nova Scotia.
52. In that post, Handshoe published: "the data points obtained from various sources that were not connected lined up perfectly, enabling me to call bullshit on Leary for lying to the Nova Scotia courts regarding the ownership of La Ferme D'Acadie."
53. In that post, Handshoe quotes from the article in *Nova Scotia Open to the World* about Trout Point Lodge. He also quotes again from a Nova Scotia Supreme Court decision.
54. In that post, Handshoe published: "When the ACOA filed suit Trout Point did not contest it and a default judgment was entered."
55. Trout Point Lodge was a never a party to the lawsuit with ACOA. No default judgment was ever entered against Trout Point Lodge.
56. At the end of that post Handshoe wrote: "Post revised as Sop did not account for the metric system. (Hat Tip a reader in Nova Scotia)".
57. I have never been accused of perjury in Nova Scotia. In have never lied to or misled the Nova Scotia courts. I was the appellant before the Nova Scotia Court of Appeal. In their October, 2009 decision the 3-judge panel of the Court of Appeal stated: "Dr. Leary's excellent

submissions make it clear that the appellants' complaints are hardly frivolous and deserve a hearing." We reached a settlement with ACOA within 6 months of that decision.

58. On August 30, 2011 Handshoe published a post entitled "About the chances that Trout Point Lodge will be bankrupt within a year.....". Portions of it were reproduced in the briefing book table at Row 22. In that post, Handshoe stated:

Obviously the girls at Trout Point Lodge do not have a stellar business record folks from their failed Washington Parish Exotic Cheese Farm to the defunct Nova Scotia Dairy farm to the ill fated Cerro Coyote Hotel project, all of which were at least partially paid for with other people's money. After Aaron Broussard's fall from grace and the end of pay to play Nova Scotia style things just got plain worser for the girls at Trout Point

59. The business Vaughn Perret, Daniel Abel, and I operated in Louisiana—Chicory Farm and the Chicory Farm Cafe—was recipient of numerous accolades, including from the Times-Picayune, the Atlanta Journal-Constitution, the New York Times, and Martha Stewart Living magazine. We also received the inaugural Tibbetts Award from the U.S. Small Business Administration in 1996. The Award was presented by Senator Ted Kennedy in a Washington, DC ceremony.
60. The small hotel business we had in Costa Rica was also heralded. For example, it was named among the Top 10 ultra boutique hotels in the world in an article published by Reuters news service. It was included in the Travel & Leisure book entitled *The World's Top 10 Hotels, Resorts, and Spas*, published in 2007. The hotel was in operation until we sold it in 2010.
61. In this post and others Handshoe has stated that Trout Point Lodge is failing or going bankrupt. The Lodge's best performing fiscal year was that ending May 31, 2012. In the past 3 years, revenues have increased over 25%. This is despite the fact that 2011 Trout Point Lodge occupancy rates were about 3% lower than in 2010.
62. The Lodge was this year selected by the Canadian Tourism Commission as the sole accommodation in Nova Scotia for its Signature Experiences Collection. The travel web site TripAdvisor presented the Lodge with a Certificate of Excellence for 2012. The Lodge is also the only accommodation in the province chosen for the "Fodor's Choice" designation from the popular Fodor's travel guide, published in 2012. Also this year in an article published in USA Today, Trout Point was named among the world's top 10 eco lodges.
63. In 2009, Trout Point Lodge was a worldwide top 10 finalist in an international tourism competition sponsored by the National Geographic Society. It was the only accommodation

among the finalists in the Geotourism competition entitled Power of Place: Sustaining the Future of Destinations.

64. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Charles Leary yields "about 1610 results."
65. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Vaughn Perret yields "about 1430 results."
66. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Trout Point Lodge yields "about 1130 results."
67. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Nova Scotia yields "about 1580 results."
68. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Bobby Jindall yields "about 1550 results."
69. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Phil Bryant yields "about 848 results."
70. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Gulf Oil Spill yields "about 2820 results."
71. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for BP yields "about 1860 results."
72. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Mary Landrieu yields "about 848 results."
73. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for David Vitter yields "about 1120 results."
74. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Ray Nagin yields "about 646 results."
75. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Mitch Landrieu yields "about 454 results."
76. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Canada yields "about 1260 results."
77. I performed another Google Site Search of Slabbed also on July 8, 2012. According to that search, searching for Tennessee yields "about 336 results."
78. Attached hereto as Exhibit "B" is a printout of the first 300 entries for a Google site search

performed on July 9, 2012, of Slabbed for the query Nova Scotia.

79. I am familiar with *Frank* magazine. I subscribe to the online version. The print magazine is available at supermarkets throughout Nova Scotia and also by subscription. I would describe it as a tabloid. It is focused on Nova Scotia gossip and scandals, often reporting on Nova Scotia law suits, judges, and politicians.
80. Sometime in the 2<sup>nd</sup> week of August, 2011, Frank reporter Andrew Speller called and left a message for me to call him back. I declined to return Mr. Speller's call.
81. I have read an article in which Mr. Speller interviewed Doug Handshoe, published in the last 2 weeks of August, 2011.
82. Handshoe's Internet publications about Vaughn Perret, Trout Point Lodge, and I are so numerous that I cannot count or remember them all.
83. In July, 2012, I ordered from the court a copy of the recording of the January 30, 2012 damages assessment hearing against Douglas Handshoe held in Courtroom 1 of the Yarmouth Justice Centre before Justice S. Hood. I also ordered a copy of the judge's public comments on January 31, 2012 made in that same courtroom.
84. Sometime in April, 2012, Elaine d'Entremont, the Prothonotary of the Supreme Court in Yarmouth told me that Mr. Handshoe's attorney, Mr. Truitt, had ordered a copy of the recording of the hearing.
85. I attended and testified at that hearing. I also made submissions to the court on the law, including mentioning the SPEECH Act. I also filed an affidavit, as did Vaughn Perret.
86. I used the audio recording to refresh my memory and I also transcribed some portions from the audio recording.
87. When I testified, Mr. Perret questioned me.
88. The portions of the hearing recording that I transcribed appear as Exhibit "C" to this affidavit and it is attached hereto. This is an accurate transcription of the hearing I attended and testified at. I indicate the time stamps of each portion of the transcription.
89. Early on in the hearing, Justice Hood told us that the claims in the Statement of Claim were deemed to have been admitted as Mr. Handshoe had defaulted.
90. The first matter Justice Hood dealt with that day, January 30, was to make sure that we the plaintiffs had served Handshoe with notice of the damages assessment hearing as required by the Nova Scotia Civil Procedure Rules. She ruled that he had been served, based not only on a

FedEx proof of delivery slip, but also based on Handshoe's own publications admitting to having received notice. She said so in her decision.

91. Attached hereto as Exhibit "D" is a copy of a fax from Handshoe received by the Nova Scotia court on January 31, 2012. It is in the court file. In the fax Handshoe states: "I was not noticed about this hearing."
92. Since filing a declaratory judgment action and also removing our enrolment of our judgment in Mississippi under the SPEECH Act with the federal court for the Southern District of Mississippi in March & April, 2012, Handshoe has continued to published about Vaughn Perret, Trout Point Lodge, and me on Slabbed and Twitter.
93. On May 2, 2012 he published a post called "BREAKING: Louisiana Ethics Board files charges against Fred Heebe, Dominick Fazzio and a host of Heebe companies." My name and that of Trout Point Lodge were included as tags to the post.
94. In that post, Handshoe stated:

Telemachus is a former Slabbed commenter due to an invasion of privacy that resulted from Aaron Broussard business associate Charles Leary of Trout Point Lodge swearing perjured affidavits to a Nova Scotia court to obtain posting information on Telemachus and Whitmergate, subsequently intimidating Telemachus into silence. Sadly, Louisiana Media Company LLC aka Fox 8 was complicit in the deception of Justice Muise of the Nova Scotia Supreme Court and resulting invasion of privacy as they too knew full well who I was having appeared on Fox 8 a year earlier.

95. On April 4, 2012, Handshoe published a Slabbed post entitled: ""The face of the enemy frightens me only when I see how much it resembles me". Leary and Perret send a nasty gram to Timothy Gillespie at South Coast Today."
96. In that post he published the following:

This is a given and our readers may remember that when Leary and Perret identified former Trout Point Lodge Manager Joyce Case Harlow as having spoken with me, they passed several threats against her to the point where she called me on the phone very upset. Their harassment of Ms Harlow finally stopped when I publicly advised her to call the FBI. I mention this because Leary and Perret's letter to Gillespie seems to indicate they have done likewise to the source for his original story, an unnamed official with the Town of Shelburne Nova Scotia

97. At the end of the post he stated:

Duly noted is the fact Gillespie has not retracted his story "Trout Point figure fingered for expensive vacations on public's dime" and I bet he took it down to save that poor woman in Shelburne further harassment by Leary and Perret. She sounds like exactly the type of person the Slabbed Investigative Team needs to talk with as we prepare our case here in Mississippi against the Goatherders.

98. I never deceived Justice Muise of the Supreme Court of Nova Scotia.

99. I have never intimidated anyone into silence. I do not know the identity of "Telemachus" and could not invade his or her privacy. I have never communicated with "Telemachus."

100. I have never harassed or threatened Joyce Case-Harlow, who is a former Trout Point Lodge employee. Handshoe published that she is disgruntled. I have never participated in any actions that would be reportable to the FBI as crimes.

101. I have never threatened or harassed any official with the Town of Shelburne, Nova Scotia.

102. On July 8, 2012, Handshoe published on the Slabbed blog Twitter.com page: Slabbed needs your help: <http://www.slabbed.org/2012/07/07/sla...> The Fox 8 case research cost almost \$3,000 & involved a file that ran around 8,000 pages.

103. I have seen Handshoe publish on Slabbed documents from the Nova Scotia Supreme Court file for the now settled lawsuit Trout Point Lodge filed against Louisiana Media Company, LLC, owner of WVUE Fox 8. For several months, he has solicited money to fund the copying and transmittal to him of documents in the court file in Yarmouth, Nova Scotia. He uses PayPal to receive funds.

104. Elaine d'Entremont of the Nova Scotia courts has told me that Timothy Gillespie of Shelburne, Nova Scotia has accessed and copied documents in the Louisiana Media court file. I have seen Timothy Gillespie in the courthouse looking at the Louisiana Media file.


105. Handshoe has published case documents from the federal district court, Southern District of Mississippi in which he is a party on the Slabbed blog.

106. On July 8, 2012, Handshoe published the following comment on Slabbed:  
The Nova Scotia Fox 8 case research cost almost \$3,000 folks and it involved a court record that ran around 8,000 pages if memory serves. The current project involves the amount of documents the NFL claims to have in the Saints bounty investigation. Because of the

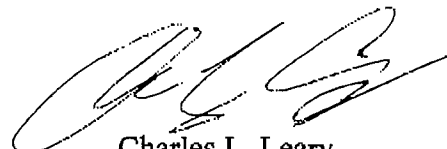
nature of this project I'm thinking \$1,500 to \$2,000 should get us home. As of right now those that have answered the call have donated a bit over \$500, and I appreciate every one of you good folks including you serial donors. ☺

Some of you folks prefer to donate cash and that is OK too. Y'all know how to find me.

Sworn to and subscribed before me, a Commissioner of Oaths of the Supreme Court of Nova Scotia, this 10<sup>th</sup> day of July, 2012.



ELAINE L. D'ENTREMONT  
COMMISSIONER OF THE SUPREME  
COURT OF NOVA SCOTIA



Charles L. Leary